

IPSC
Air Quality

INTERMOUNTAIN POWER SERVICE CORPORATION

October 13, 2003

Mr. Richard Sprott, Acting Director
Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820

Dear Mr. Sprott:

Deviation from Intermountain Power Service Corporation's (IPSC)
Title V Operating Permit #2700010002 requirement

As you are aware, IPSC has the above referenced Title V Operating Permit (permit). One of the requirements in Section I.S.2.c of this permit is to promptly notify (defined as 14 days) the Executive Secretary of any deviations from permit requirements. This letter is to notify you that a deviation may have occurred. This possible deviation comes from excess emissions resulting from startup emissions from a unit trip on September 30, 2003. IPSC submitted written notification of this event to you on October 2, 2003 (copy attached) within the seven-day period as required by the UAC R307-107 rules for unavoidable breakdowns. One clarification is needed on the October 2, 2003 letter. It refers to "air receivers being isolated." These air receivers are the fabric filter air receivers, not the Main air receivers. Sections of the air system, including the fabric filter air receivers, are typically isolated while on line for maintenance functions. After review of the circumstances surrounding the unit trip, we have determined that we should submit this deviation report for the excess emissions from the breakdown which caused the unit trip.

The permit condition that is affected by the excess emissions is II.B.2.e, which states that visible emissions shall be no greater than 20 percent opacity. On September 30, 2003, Unit 2 tripped offline due to a loss of control air pressure in the baghouse. The loss of control air pressure resulted from isolating the air receivers for maintenance purposes. This caused a loss of gas path which resulted in a unit trip. Excess opacity occurred during the start-up and averaged 66 percent for 35 six-minute periods. The start-up began at 2:06 p.m. and ended at 6:00 p.m. on September 30, 2003.

The probable cause of the Unit 2 trip is the loss of system control air pressure. However, Unit 1 was undergoing the same maintenance procedure concurrently with Unit 2 and did not have a unit trip. Compressed air systems present one of the greatest challenges in power plant operation due to a traditionally complicated and sensitive system design. This system feeds literally thousands of points of potential consumption such as control instruments, actuators, branch connections and maintenance drops. Changes in an area of one unit can affect a distant area of an entirely different system or unit. Compressed air system sensitivity and complexity played a significant role in the subject outage.

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Certain steps have been taken to insure that the cause of the unit trip will not be repeated, including holding a series of specific training sessions with both Operations management and labor personnel to reemphasize inherent sensitivities within the design of the compressed air system. These sessions included discussions of best methods for addressing compressed air system pressure transients and upsets in the various areas of the system. Additionally, an engineering investigation and analysis have been initiated to identify system design issues that can be addressed to reduce system sensitivities.

If you have any questions regarding this, please contact Mr. Dennis Killian of my staff at 435-864-6401.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,



George W. Cross
President & Chief Operations Officer and Responsible Official

 HBI:BP:jmg

cc: Eric Tharp
Jim Holtkamp

IP16_000678

10/3/03
Certified CO

INTERMOUNTAIN POWER SERVICE CORPORATION

October 2, 2003

Mr. Richard Sprott
Utah Division of Air Quality
150 North 1950 West
P.O. Box 144820
Salt Lake City, Utah 84114-4820

Dear Mr. Sprott:

Unit Two Excess Emissions
September 30, 2003 (Permit #2700010001)

As required by the Utah Air Conservation Regulations, we are attaching written notification of excess emissions during the start-up of Intermountain Generating Station, Unit Two. Mr. Jim Stevens of the Division of Air Quality was notified of the excess emissions on October 1, 2003, at 8:30 a.m.

The reports required in Section II.B.2.e of our Operating Permit relating to the Unit Two start-up are included with this letter. This was not a deviation from our Operating Permit since excess emissions resulting from shutdowns and start-ups are exempt as stated in condition II.B.2.e.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the document are true, accurate, and complete.

If you have any questions or comments, please contact Mr. Dennis Killian, IPSC's Superintendent of Technical Services, at (435) 864-6401.

Sincerely,



George W. Cross
President & Chief Operations Officer and Responsible Official

JW
LPB/BP:jmg
Attachment

cc: Bruce Harvey
Joe Hamblin

EXCESS EMISSION REPORTING FORM

DATE: October 1, 2003

I. GENERAL

A. Company: Intermountain Power Service Corporation
Plant Address: 850 W Brush Wellman Rd. Delta, UT 84624
Plant Location: Ten miles north of Delta
Unit Number: IGS #2
Phone Number: (435) 864-4414

B. Person Completing Report: Lynn Banks
Title: Lead Technical Analyst

C. Person Responsible for Review and Integrity of Report:
Dennis Killian

Signature: [Signature] for DKL
(Superintendent of Technical Services)

II. EXCESS EMISSIONS CONDITIONS REPORT

A. Cause and Nature of Excess Emissions:
Unit Two tripped offline due to a loss of control air pressure in the baghouse when the air receivers were mistakenly isolated. This caused a loss of gas path. Excess opacity averaged 66 percent for 35 six-minute periods during the start-up.

B. Excess Opacity:
Started: _____ a.m. 2:06 p.m. MST 9/30/03 Date
Ended: _____ a.m. 6:00 p.m. MST 9/30/03 Date

C. Repairs Status (action taken to repair/correct problem)
The baghouse was placed in service when temperature and fuel oil ratio permits were met. The control air supply was restored to the baghouse.

D. Pollutant Emissions:

Pollutant (Limits)	Emissions	Excess Emissions
SO ₂ (.138 lb/Mbtu)	_____ lb/Mbtu	_____ lb/Mbtu
NO _x (.461 lb/Mbtu)	_____ lb/Mbtu	_____ lb/Mbtu
Opacity (20%)	<u>66%</u>	<u>46%</u>
Particulates (est)	<u>900</u> lbs	<u>800</u> lbs

E. Preventative Measures:
Procedures for air supply work are being reviewed.